Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Application by SBC Communications Inc,)	CC Docket No. 00-4
Southwestern Bell Telephone Company, and)	CC Docket No. 00-4
Southwestern Bell Communications Services,)	
Inc. d/b/a Southwestern Bell Long Distance for)	
Provision of In-Region InterLATA Services in)	
Texas)	
)	

AFFIDAVIT OF CHRISTINE A. MAILLOUX

- My name is Christine A. Mailloux. I am Assistant General Counsel for NorthPoint Communications, Inc. My business address is 303 Second Street, San Francisco, CA 94107.
- 2. Attached to this affidavit are copies of spreadsheets from SBC's Performance Measurements web site. Attachment 1 contains NorthPoint-specific data for Performance Measurement 55.1 (Average Installation Interval-DSL) and Performance Measurement 57 (Average Response Time for Loop Makeup Information). This data includes each of the four geographic markets in Texas for the dates August 1999-December 1999.

- 3. Attachment 2 contains aggregate CLEC data, found in the Regulatory Agency (DOJ) Reports and the FCC Reports. Attachment 2 also contains only data for Performance Measurement 55.1 and 57 for August 1999 to December 1999.
- 4. The spreadsheets in Attachment 1 show that, for Performance Measurement 55.1, Southwestern Bell had recorded a total of zero DSL capable loop orders for the entire state of Texas throughout 1999. However, for Performance Measurement 57 the total is 742 requests by NorthPoint for loop qualification throughout Texas over the last five months in 1999.
- 5. The spreadsheets in Attachment 2 show, for the Agency Reports, 164 total DSL capable loop orders for Texas in 1999 under Performance Measurement 55.1. The FCC reports also show 164 loop orders for Texas in 1999 for the same measurement. The Regulatory Agency Reports, Performance Measurement 57, shows 2019 requests for loop makeup for all CLECs, in all the Texas markets for the last five months in 1999.
- 6. On January 28, 2000, I spoke to William R. Dysart to clarify why the performance measurement data posted on the web site, and relied upon by Mr. Dysart in his Affidavit, showed zero DSL capable loop orders for NorthPoint in measurement 55.1. We also discussed why the same performance data, and his Attachments G and R to his affidavit, show DSL measurements in the Resale and Specials categories. Mr. Dysart indicated that there had been a mistake in tabulating the NorthPoint loop orders for Performance Measurement 55.1 and for the other performance measurements in the Resale and Specials categories. Mr. Dysart agreed

In Re: Southwestern Bell Telephone Company InterLATA Services Application -Texas (CC 00-4) Mailloux Affidavit

Christmo Maillaid

that SWBT will have to correct the data and that such a correction will affect the support for his Affidavit in Attachments G and R.

7. I declare under penalty of perjury of the laws of the State of California and the United States of America that the foregoing is true and correct.

DATED: January 31, 2000

Christine Mailloux

Loops Requiring No Conditioning CLEC SWBT Avg. Interval No. 55.1 No. of Avg. Interval (Days) Difference Orders (Days) Objection of Difference Avg. Interval (Days) Difference Orders (Days) Difference Avg. Interval (Days) (Days)	
No. 55.1 No. of Orders (Days) Avg. Interval (Days) Difference Z - Value Avg. Interval (Days) (Days)	
Orders (Days) Difference (Days)	
Aug-99 0 n/a n/a n/a Base < 30 n/a	
Aug-99 0 n/a n/a Base < 30 n/a Sep-99 0 n/a 7.64 n/a Base < 30 n/a	
Oct-99 0 n/a 6.02 n/a Base 30 n/a	
Nov-99 0 n/a 6.12 n/a Base < 30 n/a	
Dec-99 0 n/a 6.06 n/a Base < 30 n/a	
12 Mo. Total 0 n/a 6.42 n/a n/a	
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Loops Requiring Conditioning CLEC SWBT Avg. Interval Avg. All CLECs	
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Nov-99 0 n/a n/a n/a Base < 30 n/a	
Dec-99 0 n/a n/a Rase < 30 15.00	
12 Mo. Total 0 n/a n/a n/a 15.00	

NorthPoint Communications

December 1999

Provisioning - Unbundled Network Elements (UNE)

South Texas

	Average Response Time for Loop Make-Up Information										
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. And	CLE	C	SWBT	Avg. Resp.		Avg. All CLECs					
No. 57	No. Loop	Avg. Resp.	Avg. Resp.	Time	Z - Value	Avg. Resp.					
7.0	Qualifications	Time	Time	Difference		Time					
	-										
Aug-99	0	n/a	0.99	n/a	Base < 30	n/a					
Sep-99	0	n/a	1.16	n/a	Base < 30	n/a					
Oct-99	0	n/a	1.39	n/a	Base < 30	n/a					
Nov-99	0	n/a	0.88	n/a	Base < 30	0.33					
Dec-99		n/a	0.50	n/a	Base < 30	0.20					
12 Mo. Tota	0)	n/a	0.93	n/a	Property 1	0.25					

	Average Installation Interval - DSL										
				Loops Requiring	No Conditioning]	Assistant and Particular Control of the Control of				
g in	28.00	CL		SWBT	Avg. Interval		Avg. All CLECs				
100	No. 55.1	No. of	Avg. Interval	Avg. Interval	(Days)	Z - Value	Avg. Interval				
		Orders	(Days)	(Days)	Difference		(Days)				
	Aug-99	0	n/a	n/a	n/a	Base < 30	n/a				
	Sep-99	0	n/a	5.79	n/a	Base < 30	9.50				
П	Oct-99	0	n/a.	5.0 5	n/a	Base < 30	5.43				
П	Nov-99	0	n/a	5.27	n/a	Base < 30	7.20				
	Dec-99	0	n/a	5.60	n/a	Base < 30	6.50				
117	2 Mo Total	0	n/a	5.46	n/a	i vista	6.85				
	and the same				- 0						
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		No. of	Avg. Interval	Avg. Interval	(Days)	Z - Value	Avg. Interval				
		Orders	(Days)	(Days)	Difference	Z - Value	(Days)				
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	Aug-99	0	n/a	n/a	n/a	Base < 30	n/a				
Ш	Sep-99	0	n/a	12.33	n/a	Base < 30	13.00				
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9.0	CLE	C	SWBT	Avg. Resp.		Avg. All CLECs				
No. 57	No. Loop	Avg. Resp.	Avg. Resp.	Time	Z - Value	Avg. Resp.				
***	Qualifications	Time	Time	Difference		Time				
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Aug-99	0	n/a	3.01	n/a	Base < 30					
Sep-99	0)	n/a	3.19	n/a	Base < 30					
Oct-99	18	3.06	3.22	-0.16	Base < 30	3.52 April 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
Nov-99	41	2.37	2.30	0.07	0.41					
Dec-99	34	1.76	1.89	-0.13	(0.39)	1.63 Carticle 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
12 Mo. Total	93	2.28	2.66	-0.38	i Barra	2.63				

				Average In	stallation l	Interval - DSL
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No. 55.1	No. of	Avg. Interval	Avg. Interval	(Days)	Z - Value	Avg. Interval
	Orders	(Days)	(Days)	Difference		(Days)
Aug-9		n/a	n/a	n/a	Base < 30	F 197 197 197 197 197 197 197 197 197 197
Sep-99	30	n/a	5.75	n/a	Base < 30	
Oct-99	234	n/a	4.94	n/a	Base < 30	
Nov-99	23	n/a	5.67	n/a	Base < 30	6.60
Dec-99	9[0	n/a	6.24	n/a	Base < 30	6.50
12 Mo. Tota	0	n/a	5.69	n/a	***	7.46
4.0			Loops Requirin	g Conditioning		
	CL	EC	SWBT	Avg. Interval		Avg. All CLECs
	No. of	Avg. Interval	Avg. interval	(Days)	Z - Value	Avg. Interval
	Orders	(Days)	(Days)	Difference		(Days)
Aug-99		n/a	n/a	n/a	Base < 30	建
Sep-99	3	n/a	11.00	n/a	Base < 30	
Oct-99	913	n/a	8.33	n/a	Base < 30	17.87 23.00
Nov-99	23	n/a	11.50	n/a	Base < 30	
Dec-99	0	n/a	11.50	n/a	Base < 30	15.33
12 Mo. Tota	0	n/a	10.25	n/a		15.33 15.74

	Average Response Time for Loop Make-Up Information										
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	CLE		SWBT	Avg. Resp.		Avg. All CLECs					
No. 57	No. Loop	Avg. Resp.	Avg. Resp.	Time	Z - Value	Avg. Resp.					
	Qualifications	Time	Time	Difference		Time					
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Aug-99	0	n/a	2.32	n/a	Base < 30	n/a					
Sep-99	0	n/a	3.08	n/a	Base < 30	3.10					
Oct-99	65	3.06	2.95	0.11	0.34	3.18					
Nov-99	194	2.22	2.12	0.10	0.65	2.05					
Dec-99	160	2.07	1.97	0.10	0.74	2.07					
12 Mo. Total	419	2.29	2.46	-0.16	HAMA A	2.26					

				Average In	stallation I	nterval - DSL						
41 -446		1	oops Requiring	No Conditioning)							
***	CL		SWBT	Avg. interval		Avg. All CLECs						4.74.44
No. 55.1	No. of	Avg. Interval	Avg. Interval	(Days)	Z - Value							
	Orders	(Days)	(Days)	Difference		(Days)						
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Aug-99	0	n/a	n/a	n/a	Base < 30	n/a						
Sep-99	0	n/a,	10.93	n/a	Base < 30	n/a	190	Linkaka.				100
Oct-99	1	7.00	7.47	-0.47	Base < 30	7.00		April Mills				
Nov-99	0	n/a	8.15	n/a	Base < 30	11.00						
Dec-99	0	n/a	8.42	n/a	Base < 30	8.79	Maria de Caractería					
12 Mo. Total	1	7.00	8.82	-1.82		9.88						
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	No. of	Avg. Interval	SWBT Avg. Interval	Avg. Interval (Days)	Z - Value	Avg. Interval						
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	No. of Orders	Avg. interval (Days)	SWBT Avg. Interval (Days)	Avg. Interval (Days) Difference		Avg. interval (Days)						
Aug-99	No. of Orders	Avg. interval (Days) n/a	SWBT Avg. Interval (Days)	Avg. Interval (Days) Difference	Base < 30	Avg. Interval (Days)	Andreas					
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Aug. 99 Sep. 99 Oct. 99 Nov. 99	No. of Orders	Avg. Interval (Days) n/a n/a n/a	SWBT Avg. Interval (Days) n/a n/a n/a	Avg. Interval (Days) Difference n/a n/a n/a	Base < 30 Base < 30 Base < 30 Base < 30	Avg. Interval (Days) // // // // // // // // // // // // //						
Aug.99 Sep.99 Oct.99	No. of Orders	Avg. Interval (Days) n/a n/a n/a	SWBT Avg. Interval (Days) n/a n/a n/a	Avg. Interval (Days) Difference n/a n/a	Base < 30 Base < 30 Base < 30	Avg. Interval (Days) // / // / // / // / // / // / // / //						

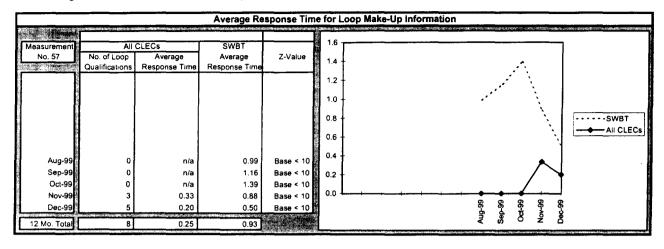
Average Response Time for Loop Make-Up Information										
	11/14/14/1969	ere saltani	Artist Constitution	(Fig. 1)	32.691%					
******	CLE	C	SWBT	Avg. Resp.		Avg. All CLECs				
No. 57	No. Loop	Avg. Resp.	Avg. Resp.	Time	Z - Value	Avg. Resp.				
	Qualifications	Time	Time	Difference		Time				
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			1							
Aug-99	0	n/a	3.30	n/a	Base < 30	n/a				
Sep-99	0	n/a	3.98	n/a	Base < 30	2.59				
Oct-99	42	1.05	4.21	-3.16	(19.90	0.99				
Nov-99	95	0.31	3.18	-2.88	(25.61					
Dec-99	93	0.41	3.67	-3.27	(27.07	0.42				
12 Mo. Total	230	0.48	3.69	-3.2 1	and the s	0.58				

PERFORMANCE MEASUREMENT TRACKING

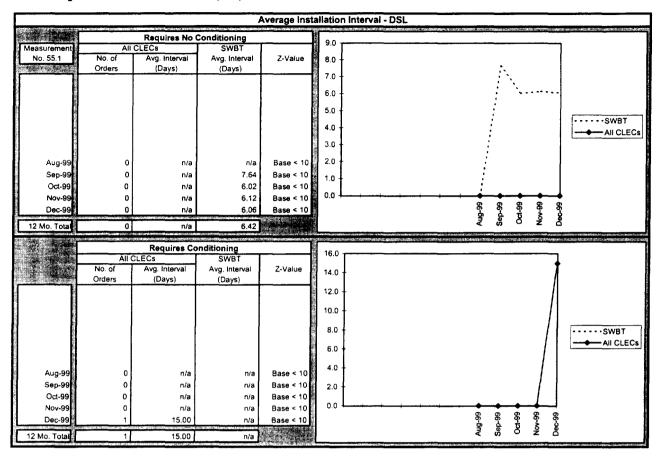
December 1999

Provisioning - Unbundled Network Elements (UNE)

South Texas



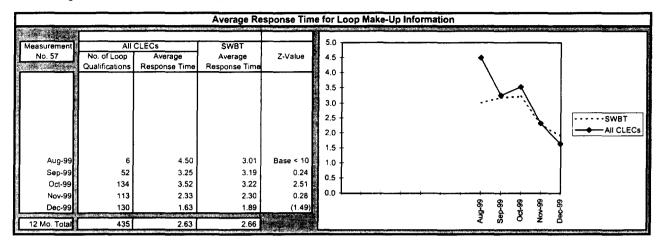
South Texas

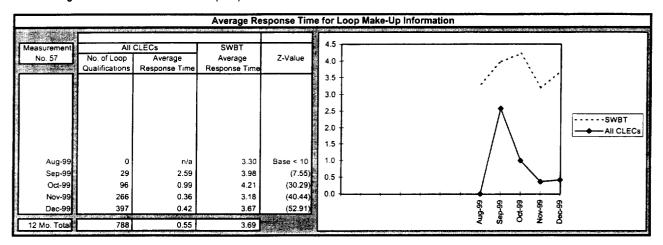


PERFORMANCE MEASUREMENT TRACKING

Provisioning - Unbundled Network Elements (UNE)

December 1999

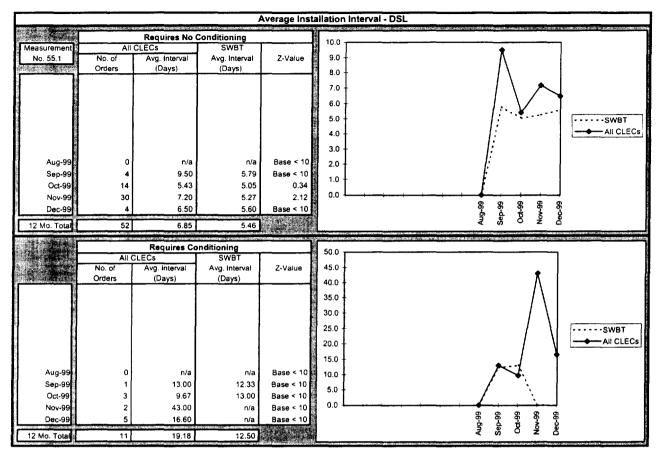


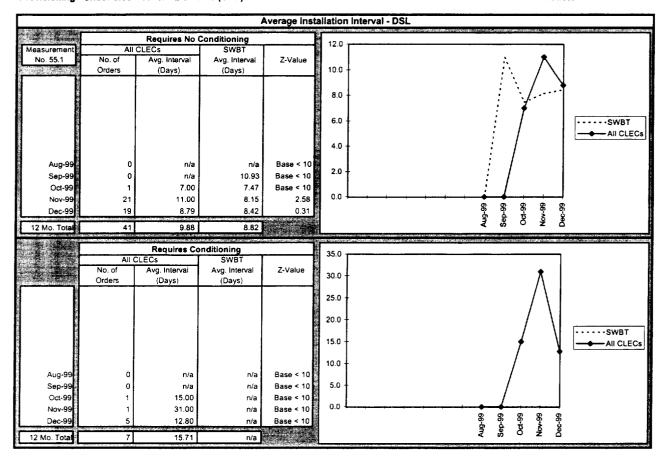


PERFORMANCE MEASUREMENT TRACKING

December 1999

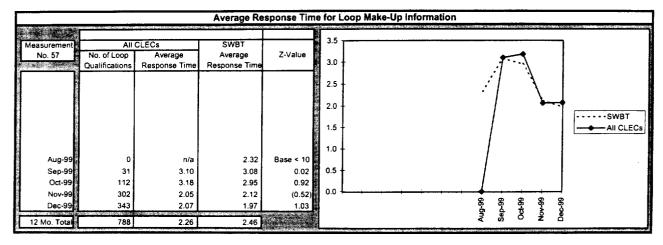
Provisioning - Unbundled Network Elements (UNE)





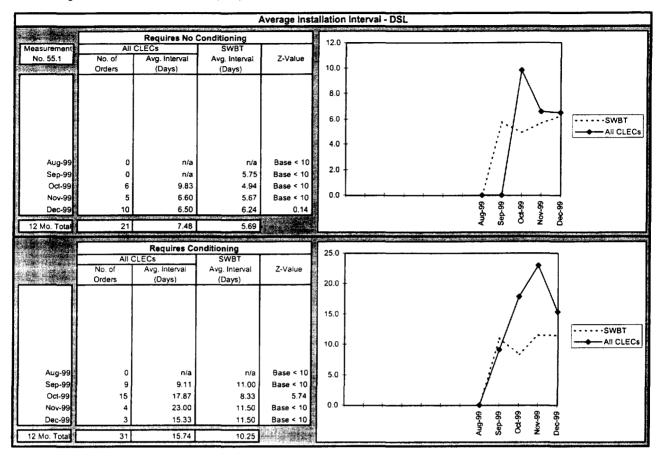
December 1999

Provisioning - Unbundled Network Elements (UNE)



December 1999

Provisioning - Unbundled Network Elements (UNE)



CERTIFICATE OF SERVICE

I, Valerie Yates, do hereby certify that on this day of January 31, 2000, I caused a copy of the foregoing Comments of NorthPoint Communications, Inc. to be served upon each of the parties listed on the attached Service List.

Valerie Yates

^{*} By messenger

SERVICE LIST

- *Magalie Roman Salas (Original, 6 copies & disk) Secretary Federal Communications Commission 445 12th Street, S.W. Room TWB-204 Washington, D.C. 20554
- *International Transcription Service 1231 20th Street, N.W. Washington, D.C. 20554
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